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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
The Use of N11 Codes and) CC Docket No. 92-105
Other Abbreviated Dialing)
Arrangements)

COMMENTS OF
THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.)
AND
THE INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION
IN RESPONSE TO
DEPARTMENT OF JUSTICE REQUEST FOR AN N11 ASSIGNMENT

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EXECUTIVE SUMMARY

The International Association of Fire Chiefs, Inc. (IAFC) and the International Municipal Signal Association (IMSA) oppose the Department of Justice (DOJ) request to reserve 311 for non-emergency police telephone calls.

An N11 code such as 311 should be reserved for only the most compelling of circumstances. Any other N11 assignment undermines the sanctity of the 911 emergency reporting system.

The DOJ's stated goals do not depend upon the requested 311 assignment. Indeed, the goal of national uniformity is inconsistent with a DOJ proposal wherein individual jurisdictions may use 311 to offer government services in addition to non-emergency police assistance.

In addition to confusion over available services, the similarity between the current 911 emergency number and DOJ's requested 311 number is certain to lead to public confusion, particularly in emergency situations. An abbreviated number is likely to increase pressure on existing 911 systems as the public - either out of confusion or disregard - begins to treat the N11 codes as a type of "express lane" for government services.

Additionally, the requested 311 assignment raises serious safety concerns that arise from the need to ensure staffing and technical compatibility between the 311 and 911

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systems. Absent such compatibility, emergency calls are certain to be lost or mishandled.

Rather than assign DOJ the 311 code, the Commission should establish a national seven (or ten) digit number for non-emergency telephone calls. Relying on the existing directory assistance numbering scheme for guidance, IMSA and IAFC recommend the establishment of a national 555-XXXX number for non-emergency calls.

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To: The Commission

COMMENTS OF
THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.
AND
THE INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

The International Association of Fire Chiefs, Inc. (IAFC) and the International Municipal Signal Association (IMSA) respectfully submit these Comments in response to an August 26, 1996 letter by the United States Department of Justice's Office of Community Oriented Policing Services (DOJ) requesting that the "311" code be reserved on a national basis for use by communities for non-emergency police telephone calls.^{1/}

^{1/} IAFC and IMSA hereby move the Commission to accept these Comments in the above-captioned docket. By public notice released September 10, 1996, the Commission requested that interested parties file comments on the DOJ request by October 10, 1996; no reply cycle was established. According
(continued...)

IMSA is a non-profit organization dedicated to the development and use of electric signaling and communications systems in the furtherance of public safety. The members of IMSA include representatives of federal, state, county, city, township, and borough governmental bodies and representatives of governmental bodies from foreign nations. Organized in 1896, IMSA is the oldest organization in the world dedicated to the activities pertaining to electrical engineering, including the Public Safety use of radio technology.

IAFC is a voluntary, professional membership society. Its approximately 10,000 members comprised of senior Fire Service officials are dedicated to the protection of life and property throughout the United States and abroad. IAFC is the major national professional association representing the interests of senior management in the Fire Service.

^{1/}(...continued)

to that notice, the DOJ's letter request was to be considered in the context of the above-captioned proceeding, CC Docket 92-105.

Because IMSA and IAFC members both operate PSAPs and rely on 911 emergency calling systems for receipt of emergency notifications, as explained below, they bring a unique perspective to the important issues raised in this proceeding. Allowing the late-filing of IAFC and IMSA's comments will help ensure that the decision in this matter is based on a more fully-developed record.

Allowing these comments to be filed beyond the comment cycle will prejudice no party to this proceeding. As a notice-and-comment rulemaking, the record is open to supplementation until the "sunshine notice" is issued by the Commission. 47 C.F.R. § 1.1200 et. seq.

IAFC and IMSA are recognized as the frequency coordinating committee for the Fire Radio Service and the Emergency Medical Radio Service (EMRS) and, in conjunction with the Personal Communications Industry Association (PCIA), constitute the recognized coordinating committee for the Special Emergency Radio Service (SERS). IAFC and IMSA members and their respective public safety agencies operate Public Safety Answering Points (PSAPs) and rely on 911 emergency calling systems for receipt of emergency notifications from the general public. IMSA and IAFC regularly express their views before the Federal Communications Commission (Commission) on issues affecting Public Safety communications.

COMMENTS

I. THE EMERGENCY CALLING SYSTEM SHOULD NOT BE UNDERMINED

IAFC and IMSA oppose the DOJ request that an N11 code, specifically 311, be reserved on a national basis for use by communities for non-emergency police telephone calls and, at the discretion of each jurisdiction, access to other government services.

As a scarce resource, an N11 code should be reserved for only the most compelling circumstances. These easy-to-remember, easy-to-dial numbers have demonstrated their worth in emergency situations, when time is of the essence.^{2/}

^{2/} Other countries use three-digit abbreviated dialing
(continued...)

Educating the general public to rely on an abbreviated "311" dialing pattern to report non-emergency situations, such as a barking dog or illegally-parked car, is certain to undermine the sanctity of the emergency reporting system.^{3/}

The risk to the emergency reporting system is magnified further if, at a jurisdiction's discretion, the number is used to handle other government services. Indeed, it is conceivable that in some areas 311 may function as a type of community operator, displacing both the telephone directory and 411, which offers local directory assistance.^{4/}

II. A NON-EMERGENCY 311 NUMBER IS LIKELY TO CREATE SIGNIFICANT PROBLEMS

DOJ asserts that "a national number for nonemergency calls that could mirror the ease of use of 911" has the greatest potential for achieving the goals of: (1) alleviating the burden of non-emergency calls on many of the nation's 911 systems and (2) "reinforc[ing] the community partnerships that form a cornerstone of community policing."

^{2/} (...continued)
patterns for emergency calling, as well. Great Britain, for example, uses 999 as its equivalent to the U.S.' 911 emergency number; Japan uses 119.

^{3/} Developments in other areas may also compromise the sanctity of the 911 emergency system. It has been reported, for example, that some health maintenance organizations (HMOs) in California are advising their members to call the HMO, rather than 911, for ambulance dispatch, in order that the HMO may bill the insurer and generate additional revenues.

^{4/} IAFC and IMSA do not oppose retention of the 411 code for local directory assistance.

While DOJ correctly identifies the benefits associated with a national number, it fails to acknowledge the risks associated with an N11 assignment for non-emergency police calls. Because neither goal is dependent upon an N11 assignment, but may be satisfied by alternative dialing patterns, it is unreasonable to assume these risks.

A. A 311 Assignment is Certain to Generate Confusion

In support of its request, DOJ contends that "[r]eservation of an N11 code on a national basis is important to foster national uniformity." The national uniformity that DOJ seeks does not depend upon assignment of an N11 code. Alternate abbreviated dialing arrangements or uniform seven and 10-digit dialing patterns are equally capable of achieving DOJ's goal of national uniformity.

By definition a single number cannot foster national uniformity if, as the DOJ proposes, those specific government services available through the non-emergency number depend upon the jurisdiction in which the caller is located. Travelers and the recently-relocated are almost guaranteed to be ignorant of the specific services a locality may offer through its standardized, abbreviated number. Confusion over available services is a certainty in metropolitan areas containing multiple adjacent jurisdictions.^{5/} Infrequent callers and both the young and

^{5/} For example, restrictions on interstate banking were a
(continued...)

elderly are among those likely to be most susceptible to confusion over available services.

A different type of confusion - but one with perhaps more serious consequences - arises from the similarity between the current 911 emergency number and DOJ's requested 311 assignment. Advertisers concede that the public responds to the cacophony of news, information, and advertising by selectively retaining only portions of what is heard or read.^{5/} Even with constant advertising and educational efforts, some portion of the public is unlikely to retain the distinction between these two very similar numbers. What is most likely to be retained is that an abbreviated number can be dialed to report both emergencies and aggravations.

B. 311 Will Only Increase Pressures on Existing Systems

Others may believe they need not comply with the advertised distinction between emergency and non-emergency calls. Indeed, the pressure on current 911 systems results in large part from the public's failure to reserve the 911

^{5/} (...continued)
source of long-standing confusion. This confusion, and resultant annoyance, was particularly acute for customers of banks that maintained locations in a metropolitan area that encompassed two or more states, such as Washington, D.C.

^{6/} Advertisers frequently complain, for example, that though audiences may enjoy a particular advertisement, many audience members are unable to subsequently identify the product which is the subject of that advertisement.

number for its explicit and well-known purpose: emergency calls.

It is increasingly acknowledged that the current 911 system is a victim of its own success. At first blush, establishing a second N11 number for non-emergency calls would appear to relieve the pressure on 911 systems. It is more likely, however, to exacerbate that pressure as the emergency designation associated with 911's abbreviated dialing erodes and the public begins to treat the N11 codes as a type of "express lane" for government services.

Rather than allow the proliferation of N11 dialing codes, the more appropriate response to DOJ's request is to (1) assign a national seven or 10 digit number; (2) mount an advertising/educational campaign regarding the new non-emergency number; and (3) renew educational efforts on the proper use of 911.

C. Safety and Technical Considerations Weigh Against the DOJ Request

The certainty of public confusion raises serious safety and technical concerns. It is reasonable to presume that, under emergency circumstances, a percentage of callers will confuse the two N11 codes that would be available to them under the DOJ's proposal.^{2/} Non-emergency staff are unlikely to be adequately trained to recognize and/or handle

^{2/} Indeed, given the location of the digits, the 311 code actually may be easier to dial than 911, thereby contributing to misdialing.

these emergency calls. Even with a trained staff, critical delay is inevitable unless the non-emergency system is configured to identify the caller's designated PSAP and can convey the caller's automatic number identification (ANI) and/or automatic line identification (ALI) to that PSAP.^{8/} ANI/ALI transmission is of particular importance in those situations when the PSAP location differs from the location of the non-emergency answering point, as when a single PSAP serves large regions or an entire state.

Even if envisioned as occupying the same location, a non-emergency answering point adequate to handle projected demand requires that current PSAP facilities be enlarged, renovated, or relocated at no small expense.

Finally, staffing and technical compatibility between PSAPs and non-emergency systems is necessary to ameliorate the inevitable confusion that will result from multiple N11 "police" dialing codes. Absent such compatibility, emergency calls are certain to be lost or mishandled. Ensuring the requisite system compatibility will increase the complexity and cost associated with these projects. Whatever the outcome of the Baltimore, Maryland 311 trial, the Commission must recognize that the trial run is being conducted in a concentrated urban area. That trial fails to capture the full range of concerns and issues associated

^{8/} The non-emergency system must ensure that incoming calls have not been stripped of ANI/ALI information.

with the requested N11 assignment, including those of PSAPs serving multiple jurisdictions. It is these PSAPs, after all, that will bear the brunt of the costs and complexity associated with ensuring staffing and technical compatibility between emergency and non-emergency systems.

The DOJ's goals, which IMSA and IAFC support, can be achieved with a traditional seven or 10-digit national number without risking the public safety.^{2/} Given that an N11 assignment in this situation is likely to generate significant disadvantages, it is imperative that the Commission deny the DOJ request for the 311 code and, instead, grant alternative relief.

III. SEVEN DIGIT DIALING ADVANCES THE DOJ'S GOALS AND OBJECTIVES

IAFC and IMSA appreciate DOJ's interest in establishing a community policing number that would be, as President Clinton stated, "as easy to use and remember as 911." That number, however, need not be an N11 number. If DOJ is intent on an abbreviated number, there are, as the Commission recognizes, "a variety of abbreviated dialing arrangements" that might adequately serve DOJ's purposes without risking the confusion that 311 is virtually certain to generate.^{10/} To ensure that callers recognize the non-

^{2/} The Dallas, Texas non-emergency number referenced in the DOJ's August 26, 1996 letter is a seven digit number.

^{10/} *The Use of N11 Codes and Other Abbreviated Dialing*
(continued...)

emergency nature of the proposed community policing number, it would appear preferable to use a seven or ten-digit number.

Existing directory assistance calling numbers offer guidance in responding to the DOJ request. Callers seeking local directory assistance dial 411 (or 1-411), while callers seeking assistance with long-distance numbers dial the longer sequence 1+(NPA)+555-1212. End users thus distinguish between local and long distance directory assistance calls. Recognizing that the general public already equates the "555" NPA with a type of public service, it would appear to be a logical step to use that "555" NPA for other public services, as well.^{11/}

In this case, then, those callers requiring immediate emergency assistance in life-threatening situations would call the abbreviated number 911, while callers requiring non-emergency assistance would dial a standardized "555" seven or 10-digit sequence, such as 555-6789 (or 1+555-6789) or (NPA)+555-6789 in metropolitan areas with multiple area codes.

^{10/} (...continued)

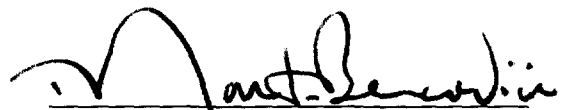
Arrangements, CC Docket No. 92-105, Notice of Proposed Rulemaking, FCC 92-203 (rel. May 6, 1992), 57 Fed.Reg. 22681 (NPRM) at para. 19.

^{11/} A single "800" (or 888) number may be an alternative if concern exists as to public perception of charges associated with the call. The "555" prefix, however, offers greater advantages; among other things, inclusion of the NPA tailors the number to the community.

Such a standardized number - particularly if it includes the community's area code - promotes DOJ's twin goals of alleviating the burden of non-emergency calls on many of the nation's 911 systems and reinforcing community partnerships. This type of standardized number, moreover, satisfies the DOJ's interests in designating a number that both is easy to use and remember and fosters national uniformity. Finally, it addresses the concerns of both IMSA and IAFC regarding unreasonable encroachments on the 911 emergency calling system and preserves a scarce resource for truly compelling circumstances.

WHEREFORE, THE PREMISES CONSIDERED, the International Association of Fire Chiefs, Inc. and the International Municipal Signal Association respectfully request that the Federal Communications Commission take action consistent with the foregoing.

Respectfully submitted,



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